

FEB 07 1997

Robert M. Krill, Director  
Bureau of Drinking Water and Ground Water  
Wisconsin Department of Natural Resources  
P.O. Box 7921  
Madison, Wisconsin 53707

Dear Mr. Krill:

This enclosed end of year report is being sent to highlight the progress that the Wisconsin Department of Natural Resources (WDNR) has made administering the Underground Injection Control (UIC) program during the Federal Fiscal Year 1996. In preparing this report, we have drawn from a number of sources including the June 7, 1996, meeting of John Taylor and Charles Anderson of my staff with your staff, your 4th quarter reporting forms which were recently received, and additional written and verbal communications with your staff. Through this report, we hope to continue the dialogue on future goals and direction of your program in addition to how U.S.EPA can continue to assist with the accomplishment of these goals.

As part of our partnership with your agency, we are pleased to continue the discussion of pertinent State topics of mutual concern and interest, with both agencies working together to propose solutions. We feel that this approach reflects the maturation of your program, your demonstrated capabilities and U.S.EPA's commitment to State assistance. Please feel free to comment on both our presentation of topics and proposed recommendations and conclusions, as we wish to continue to assist your agency in capacity building for the UIC program. Also, please let us know if there are any additional areas in which we can provide either technical or program assistance. If you have any questions, please contact either John Taylor or Charles Anderson of my staff who can be reached at (312) 886-4299 or (312) 886-1501, respectively. We appreciate your dedication and continued support of the UIC program and the efforts of your staff.

Sincerely,

Rebecca Harvey, Chief  
Underground Injection Control Branch

Wisconsin Department of Natural Resources  
Underground Injection Control Program  
Fiscal Year (FY) 1996 End-of-Year

During FY 1996, the State of Wisconsin's Department of Natural Resources (WDNR) Underground Injection Control (UIC) Program continued to evolve and make progress in several significant areas:

#### WELL INSPECTIONS

WDNR State regulatory staff completed inspections of 94 well sites during the FY 1996 program year. The majority of the injection wells inspected were shallow storm water drywells located along roadways in residential areas. Eight of the inspected wells are located near public water supply wells and were installed by the water utility as part of a vyredox iron removal system. None of the inspected facilities appeared to be receiving commercial or industrial waste products. WDNR's UIC staff has documented the existence of 144+ Automotive Service Station Disposal Wells in the State. The location of these disposal wells have been turned over to the WDNR's Regional field staff responsible for Solid and Hazardous Wastes for site inspection, evaluation and determine if the well is a threat to the environment or human health. We look forward to hearing of any progress which has occurred in this effort.

#### COUNTY INVENTORY PROJECT

Field staff working out of the Department of Natural Resources' Southeast District Headquarters completed a survey of unsewered areas in northern Waukesha County. A copy of the final report for this effort has been received by Region 5. Over 100 additional shallow injection wells were identified for addition to the State's Class 5 well inventory.

#### STATEWIDE INJECTION WELL INVENTORY

The Wisconsin Department of Natural Resources (WDNR) continues to maintain an inventory of injection wells, type of injectate deposited in the well and the wells' location in the State. Over 2,000 shallow injection wells are currently listed on the State's inventory. The majority of these injection wells are large septic systems which receive domestic waste. These systems are constructed according to specifications found in the State's administrative code established by the Wisconsin Department of Commerce and regulated through county-level agencies responsible for overseeing private onsite waste water disposal systems.

#### MEMORANDUM OF UNDERSTANDING

August 1, 1996 saw the completion of a Memorandum of Understanding (MOU) and implementation of this Agreement/MOU by four WDNR Bureaus. This agreement establishes a basic framework for review and approval of environmental restoration projects which seek to use underground injection wells to stimulate or enhance in-situ remediation of soil or Ground Water contaminants. This MOU streamlines the WDNR's review of remediation proposals yet still ensures that all applicable Federal and State regulatory requirements are considered and complied with as part of the review process. This document has now been distributed to WDNR Regional offices along with guidance on how to implement it. The framers of this MOU are the Bureau of Water Supply (now known as the Bureau of Drinking Water and Groundwater), Bureau of Water Resources Management, Bureau of Wastewater Management (now known as the Bureau of Watershed Management), and the Bureau of Solid and Hazardous Waste Management (now known as the Bureau of Remediation and Redevelopment).

## STORM WATER DRAINAGE WELLS

State UIC program staff has been working with the Bureau of Watershed Management to develop a comprehensive storm water management program which would address all discharges of storm water. Full implementation of this program will ultimately lead to closure of all drainage wells which pose a danger to ground water quality or threaten human health. As part of this program, the Bureau of Drinking Water and Ground Water is working with the affected communities to develop an interim storm water management strategy under which existing drainage wells would be allowed to continue to operate as long as the communities adopt inspection and maintenance programs and demonstrate that the discharges are not impacting public or private water supplies. The WDNR intends to proceed as scheduled with issuance of conditional variances for existing drywells which are evaluated and determined not to be endangering underground sources of drinking water during FY 1997. WDNR's UIC staff will continue their outreach effort, in coordination with Region 5, to ensure that a single consistent message is transmitted to the affected communities.

## CLASS 5 STAKEHOLDERS ACTIVITIES

The WDNR UIC Program Coordinator participated in Class 5 stakeholders meetings in Washington, D.C. and St. Paul, Minnesota to help provide feedback to U.S.EPA on Class 5 regulation developments. The meetings coincided with the Ground Water Protection Council's Spring Policy Meeting and Fall Technical Conference. State UIC staff also submitted written comments in the fall of 1996 during the public comment period following publication of the proposed Class 5 rules in the Federal Register. As the revised Class 5 regulation development effort progresses during FY 1997, Region 5 will continue to share the various working drafts with the State and we welcome State comments on them so that we might better represent your interests. We also continue to encourage participation in future stakeholders meeting such as the one scheduled for March 5, 1997 in conjunction with the Ground Water Protection Council spring meeting. This meeting and subsequent ones will explore the best approaches for conducting the upcoming survey of all but industrial Class 5 wells in order to help determine the need for additional regulations.

## STORM WATER MONITORING PROJECT

The WDNR and the University of Wisconsin-Stevens Point have jointly signed an agreement to initiate a storm water drainage well/ground water monitoring project in the Village of Park Ridge, Wisconsin. Funding for the first year of research has been provided by Region 5 as an add-on to Wisconsin's annual UIC program grant. This monitoring project will focus on documenting the level of Poly-Nuclear Aromatics in the shallow ground water aquifer. The first reports should be submitted to Region 5 in the summer FY 1997, and the final report will be available by the summer of FY 1998.

## WDNR REORGANIZATION

The WDNR is currently updating its internal structure. The WDNR is transforming its current six-district field structure into five regions which are roughly aligned with the major ecological regions found in Wisconsin. Within each region, four to six geographic management units (GMUs) whose boundaries are based on major river watersheds will be established. WDNR regional staff are to be assigned to teams which will be responsible for assessing environmental needs within each GMU. The goal of this arrangement is to encourage a higher level of interdisciplinary cooperation and involvement in setting goals for resource management and environmental protection activities. A six division structure in the central office in Madison will replace the older structure of four divisions and two offices. The reorganized central office will have fewer staff and supervisory layers and will provide policy and other essential support for field operations. The UIC program will reside within the Bureau of Drinking Water and Ground Water in the newly created Water Division.

## OUTREACH

During FY 1996, WDNR's UIC staff made presentations at the State's Waste Minimization and Pollution Prevention Workshops, Automotive Waste Workshops and the Liquid Waste Haulers Workshops. WDNR's UIC staff also supplied Class 5 Best Management Practices to County Code Administrators, who are the State's first line of defense against environmental damage to the Ground Water through the misuse of septic tanks and drain fields for disposal.

## RECOMMENDATIONS AND CONCLUSIONS

As usual, we wish to compliment you and your staff for administering an effective Underground Injection Control program. We look forward to assisting you in following up on the fine work you have completed in FY 1996 and to working in partnership with your Agency in FY 1997.